

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
Case No. 06-CVS-_____**

JASON COLLETT,)	
)	
Plaintiff,)	
)	
v.)	
)	
COMMERCIAL RECOVERY SYSTEMS, INC.,)	
)	
Defendant.)	

**STIPULATION AND JOINT MOTION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

Plaintiff, Jason Collett, through counsel, and Commercial Recovery Systems (“CRS”), through its Vice President David Devany, pursuant to Fed. R. Civ. P. 6 and Local Civil Rule 6.1, EDNC, hereby respectfully stipulate and agree as follows and move the Court for an extension of time as follows:

1. The parties are in negotiation to hopefully resolve the matter.
2. If negotiation fails, then CRS will need time to locate North Carolina counsel and respond to the complaint.
3. This motion is made in good faith and not to delay.
4. CRS agrees not to engage in any further contacts or communications with Jason Collett, his immediate family relatives, or with other servicemembers at Fort Bragg with regard to SSG Collett, pending the final resolution of this matter.
5. The parties hereby request that CRS be allowed thirty days additional time through and including September 18, 2006 within which to reach an agreement with Plaintiff to resolve this matter, or failing that, to respond to the Complaint.

This the 16th day of August, 2006.

s/ Mona Lisa Wallace, Esq.

Mona Lisa Wallace

NC State Bar No. 009021

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OF COUNSEL:

Angela Martin, Esq.

Office of the Staff Judge Advocate

XVIII Airborne Corps & Fort Bragg

Fort Bragg, NC 28310-5000

N.C. State Bar No. 34951

Phone: 910 396 6113

I have reviewed the above stipulation and agree to its terms on behalf of Commercial Recovery Systems.

Dated: 8-15-6


Vice President David Devany
On behalf of Commercial Recovery Systems

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2006, I served the foregoing to the following:

David J. Devany, Vice President, Systems Manager
Commercial Recovery Systems, Inc.
8035 E R L Thornton Freeway
Dallas TX 75228

By: /s/ Mona Lisa Wallace
Mona Lisa Wallace